



HELEN F. DALTON & ASSOCIATES, P.C.
ATTORNEYS AT LAW

80-02 Kew Gardens Road, Suite 601, Kew Gardens, NY 11415
Tel. (718) 263-9591 Fax. (718) 263-9598

May 22, 2020

Via ECF

The Honorable Judge Vera M. Scanlon
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11201

**Re: Cabrera, et al. v. Amendola Marble & Stone Center, Inc., et al.
19-CV-6530 (RRM)(VMS)**

Dear Judge Scanlon:

We represent the Plaintiffs in the above-referenced matter and we submit this status report pursuant to the Court's May 18, 2020 Order regarding the latest developments in settlement discussions with unrepresented defendants Ruben Sinchi, Victor Bautista and "ABC Corporation" d/b/a Stone Logic (collectively, the "Stone Logic Defendants").

After numerous meetings in person and via telephone, Plaintiffs are very close to reaching a settlement in principle with the Stone Logic Defendants. As the claims against the Stone Logic Defendants were brought under the Fair Labor Standards Act ("FLSA"), we respectfully ask the Court for 45 days to finalize the terms of the agreement and to prepare the settlement agreement and Plaintiffs' motion for approval of the settlement agreement.

Additionally, our office has had multiple conversations with counsel for Defendants Amendola Marble & Stone Center, Inc. and Joseph Amendola. Although no settlement has been reached at this time, the settlement discussions are ongoing.

We thank Your Honor for her consideration on this matter and remain available to provide any additional information.

Respectfully submitted,

/s/
Roman Avshalumov, Esq.